

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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|-----------------------------------|---|---|
| In re: |) | Chapter 11 |
| |) | |
| W.R. GRACE & CO., <i>et al.</i> , |) | Case No. 01-1139 (JKF) |
| |) | Jointly Administered |
| |) | |
| Debtors. |) | Re: Docket Nos. 14907, 14908 and |
| |) | 14929 |

**DEBTORS' EMERGENCY MOTION FOR ENTRY OF AGREED ORDER
PERMITTING ADDITIONAL TWO DAYS FOR RESPONSES TO BE FILED
REGARDING CERTAIN MOTIONS RELATED TO CONSULTING EXPERT ORDER**

1. The Court currently has set on its calendar for April 13, 2007, three related motions involving the Court's Consulting Expert Order, dated March 6, 2007 (Docket no. 14150). These matters are as follows: (i) the Debtors' motion to compel compliance with the Consulting Expert Order (Docket no. 14929); (ii) certain law firm's motion for extension of time to appeal the Consulting Expert Order (Docket no. 14907); and (iii) certain law firm's motion for a stay pending appeal of the Consulting Expert Order (Docket no. 14908).

2. Pursuant to the agreement of the parties, the response deadline for the first motion, Debtor's motion to compel compliance, is Friday, April 6, 2007. Pursuant to Order of the Court entered on movants' request for shortened time for the hearing on the second and third motions (Docket no. 15020), the Court set the response deadlines on those motions for Wednesday, April 4, 2007. No reply deadlines are set for any of the motions and the parties do not anticipate filing any such replies.

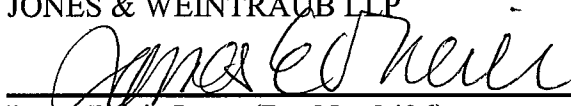
3. The parties did not intend to have the response deadlines for the three motions to differ and logically they should all be due on the same day. As a result, the parties have agreed, subject to the Court's approval, that consistent with the other response deadline, the Debtors should have until Friday, April 6, 2007 to respond to the motion for extension of time and motion for stay pending appeal.

Wherefore, the Debtors respectfully request entry of the attached Agreed Order permitting a two day extension of their response deadline on the two referenced motions.

Dated: April 4, 2007

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